

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

JAMES M. BAKER, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00272-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
ROCHELLE PHILLIPS, On Behalf of Herself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00277-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	

[Caption continued on following page.]

MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
FOR APPROVAL OF SELECTION OF LEAD AND LIAISON COUNSEL

JULY 5, 2005

ROBERT WILKINS, Individually and On Behalf of All Others Similarly Situated,)	Civil Action No. 1:05-cv-00287-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
LEONARD BRONSTEIN, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00289-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
GREG PENN,)	Civil Action No. 1:05-cv-00293-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
CLIFFORD W. JONES, On Behalf of Himself and All Others Similarly Situated,)	Civil Action No. 1:05-cv-00316-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	

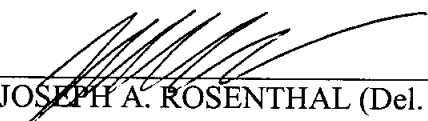
[Caption continued on following page.]

MICHAEL D. BLUM,)	Civil Action No. 1:05-cv-00372-GMS
)	
Plaintiff,)	<u>CLASS ACTION</u>
)	
vs.)	
)	
MBNA CORP., et al.,)	
)	
Defendants.)	
)	
_____)	

Class member City of Deerfield Beach Non-Uniform Employees Retirement Plan ("City of Deerfield Beach"), will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating the Actions; (ii) appointing City of Deerfield Beach as Lead Plaintiff; (iii) approving City of Deerfield Beach's selection of the law firm of Lerach Coughlin Stoia Geller Rudman & Robbins LLP to serve as Lead Counsel and the law firm of Rosenthal, Monhait, Gross & Goddess, P.A. to serve as Liaison Counsel; and (iv) granting such other and further relief as the Court may deem just and proper. In support of this Motion, City of Deerfield Beach submits herewith a Memorandum of Law and Declaration of Jeffrey S. Goddess dated July 5, 2005.

DATED: July 5, 2005

ROSENTHAL, MONHAIT, GROSS
& GODDESS, P.A



JOSEPH A. ROSENTHAL (Del. No. 234)
JEFFREY S. GODDESS (Del. No. 630)
JESSICA ZELDIN (Del. No. 3558)

919 Market Street, Suite 1401
Wilmington, DE 19801
Telephone: 302/656-4433
302/658-7567 (fax)

[Proposed] Liaison Counsel

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
PAUL J. GELLER
197 S. Federal Highway, Suite 200
Boca Raton, FL 33432
Telephone: 561/750-3000
561/750-3364 (fax)

LERACH COUGHLIN STOIA GELLER
RUDMAN & ROBBINS LLP
SAMUEL H. RUDMAN
DAVID A. ROSENFELD
MARIO ALBA, JR.
200 Broadhollow Road, Suite 406
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)

[Proposed] Lead Counsel for Plaintiffs

I:\MBNA\LP Motion\DE\LP Motion.doc